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7 *Attorneys for Defendant HKM Productions, Inc.*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 Board of Trustees of the Southern Nevada  
Joint Management and Culinary and  
12 Bartenders Training Fund dba Culinary  
Academy of Las Vegas,

13 Plaintiff

14 v.

15 Christopher Fava, an individual; Jaime  
16 Monardes, an individual; Eclipse Theater,  
LLC, a Nevada limited liability company;  
17 Eclipse Theater Las Vegas, Limited  
Partnership, a Delaware Limited  
Partnership; 21 Greens Inc., a Nevada  
18 corporation; Federal Insurance Company,  
an Indiana corporation; HKM Productions  
19 Inc., a Nevada corporation,

20 Defendants.  
21

Case No.: 2:18-cv-00036-JCM-CWH

22 **STIPULATION AND ORDER TO EXTEND TIME TO FILE ANSWER**  
23 **(First Request)**

24 IT IS HEREBY STIPULATED AND AGREED by and between Defendant HKM  
25 Productions, Inc. ("Defendant") and Plaintiff Board of Trustees of the Southern Nevada Joint  
26 Management and Culinary and Bartenders Training Fund dba Culinary Academy of Las Vegas  
27 ("Plaintiff"), by and through their respective undersigned counsel, to extend the deadline for  
28 Defendant to file its answer to the Plaintiff's Complaint from its current deadline currently set for

1 February 4, 2018, by an additional thirty (30) days, until March 6, 2018. This is the first  
2 requested extension of this deadline between the parties. The extension is being requested as  
3 Counsel for Defendant and Plaintiff wish to engage in settlement negotiations.

4 The extension will not prejudice any party and will allow Defendant to gather and produce  
5 informal discovery and subsequently engage in negotiations with Plaintiff prior to the parties  
6 incurring litigation fees and costs which could serve to prejudice the parties by causing what could  
7 be used as settlement proceeds to instead be used for litigation fees and costs. The parties are not  
8 delaying the conclusion of this matter by way of trial or otherwise; no trial date has yet been  
9 ordered.  
10

11 IT IS SO STIPULATED this 1<sup>st</sup> day of February, 2018.

12 LBC LAW GROUP

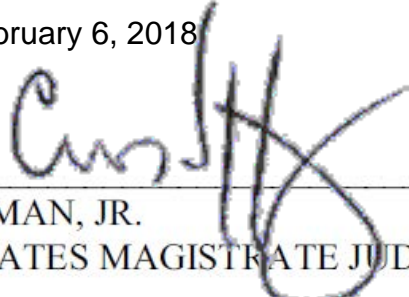
13 BROWNSTEIN HYATT FARBER  
14 SCHRECK, LLP

15 By: /s/ John C. Courtney, Esq.  
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25 IT IS SO ORDERED.

26 DATED: February 6, 2018

27   
28 C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE